#### CONSTRUCTION PERMIT

#### PERMITTEE

Rexam Beverage Can Company Attn: Geoffrey A. Wortley 8770 West Bryn Mawr Avenue Chicago, Illinois 60631

<u>Application No.</u>: 02110035 <u>I.D. No.</u>: 031600BRL

Applicant's Designation: Date Received: November 15, 2002

Subject: New Bodymaker and Modification of Coating Lines 1 and 2

Date Issued: February 21, 2003

Location: 1101 West 43rd Street, Chicago

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of new can bodymaker and increase in Speed Lines 1 and 2 as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This permit allows the Permittee to install a new beverage can bodymaker to operate with 18 existing bodymakers units, for support the production of two-piece aluminum beverage cans. The new bodymaker will be controlled by the existing oil mist collecting system (CD02).
- b. This permit allows the Permittee to increase the speed of existing Coating Lines 1 and 2, which process cans from bodymakers to increase the production of printed aluminum beverage cans.
- 2. The new bodymaker and the existing bodymakers controlled by the existing oil mist collection system are subject to 35 IAC 212.321, which provides that no person shall cause or allow the emission of particulate matter (PM) into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of PM from all other similar process emission units for which construction or modification commenced on or after April 14, 1972. For this purpose, all bodymakers controlled by the oil-mist collecting system are considered similar units.
- 3a. Coating Lines 1 and 2 are subject to the New Source Performance Standard (NSPS) for Beverage Can Surface Coating, 40 CFR 60 Subparts A and WW. The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.
- b. Pursuant to 40 CFR 60.492, the Permittee shall not discharge or cause the discharge of volatile organic compounds (VOC) emissions to the atmosphere that exceed the following volume-weighted calendar-month average emissions:

- 0.29 kilogram of VOC per liter of coating solids from each two-piece can exterior base coating operation, except clear base coat;
- ii. 0.46 kilogram of VOC per liter of coating solids from each two-piece can clear base coating operation and from each overvarnish coating operation; and
- iii. 0.89 kilogram of VOC per liter of coating solids from each two-piece can inside spray coating operation.
- 4a. Coating Lines 1 & 2 are subject to 35 IAC 218.204(b), which provides that, no owner or operator of a coating line shall apply at any time any coating in which the volatile organic material (VOM) content exceeds the following emission limitations for the specified coating. The following emission limitations are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. Compounds, which are specifically, exempted form the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition.

		kg/l	<u>lb/gal</u>
i.	Exterior Basecoat (Bottom Varnish) and Overvarnish	0.25	2.1
ii.	Interior Body Spray Coat (Two Piece)	0.44	3.7
iii.	Exterior End Coat	0.51	4.2

- b. Compliance with this Subpart must be demonstrated through the applicable coating analysis test methods and procedures specified in 35 IAC 218.105(a) and the recordkeeping and reporting requirements specified in 35 IAC 218.211(c).
- 5a. This permit is issued based on the bodymaker and the Coating Lines 1 and 2 not being major modification subject to 35 IAC Part 203, Major Stationary Sources Construction and Modification (MSSCAM) because the net emissions increase of VOM from the units are less than 25 tons per year, as shown in Attachment A.
- b. The bodymaker and the Coating Lines 1 and 2 are not a major project subject to 112(g), Hazardous Air Pollutants (HAPs), because the emissions of HAP's from the affected units are less than 10 tons/year for a single HAP and less than 25 for the combination of HAPs.
- Sa. At all times, the Permittee shall to the extent practicable, maintain and operate the bodymaker and the coating lines in a manner consistent with good air pollution control practice for minimizing emissions.

- b. Production from Coating Line 1 and 2 combined shall not exceed 136 million cans/month and 1,470 million cans/year.
- c. Total use of gallons of cleaning solvent\* use in the Coating Lines 1 and 2 shall not exceed 30 gallons/year.
  - \* This limit only applied to solvent that contains VOM
- 7a. This permit is issued based on negligible emissions of PM from the new bodymaker. For this purpose negligible emissions shall not exceed 0.1 lb/hr and 0.44 tons/year.
- b. Coating Lines 1 and 2 shall comply with the following limits:
  - i. The amount of VOM contained in individual coating and cleanup solvent shall not exceed:

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Inside Spray	2.90
Bottom End Spray	2.10
Overvarnish	1.70
Cleanup Solvent	6.98

- ii. Emissions of VOM from the Coating Lines 1 and 2 combined shall not exceed 25.4 tons/month and 152.4 tons/year.
- iii. Emissions from and operation of each combustion equipment in the Coating Lines 1 and 2 shall each not exceed the followings:

		$\mathrm{NO}_{\mathrm{x}}$ Em	issions
Equipment	Firing rate	(Lb/hr)	(Ton/Year)
Pin Oven	5.6	0.53	2.34
Bake Oven	5.5	0.52	2.28

- 8. Upon request by the Illinois EPA, the Permittee shall conduct performance tests pursuant to the NSPS 40 CFR 60.493(b)(1), the Permittee shall determine the VOC content of the coatings from formulation data supplied by the manufacturer of the coating or by an analysis of each coating, as received, using USEPA Method 24 or equivalent.
- 9a. The Permittee shall keep the following records for the Coating Lines 1 and 2:
  - Name and identification of each coating, clean up solvent and ink used.
  - ii. Amount of each coating, clean up solvent and ink used (gallons/month and gallons of solids/year).

- iii. VOM and HAP content of each coating, clean up solvent and ink used(lb/VOM gallon and HAP/gallon of coating minus water and exempt compounds, and also lb VOM/gallon and HAP gallon of solids as applied).
- iv. Total VOM and HAP emissions (tons/month and tons/year), with all supporting data and calculations.
- b. The Permittee shall keep the following records for combustion equipment in the Coating Lines 1 and 2:
  - i. Total firing rate of the coating lines (million Btu/hr).
  - ii. Total nitrogen oxide  $(NO_x)$  emissions (lb/hr and tons/year), with all supporting data and calculations.
- 10. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five years from the date of entry and shall be made available for inspection and copying by the Illinois EPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.
- 11. If there is an exceedance of the requirements of this permit as determined by the records required by this permit or by other means, the Permittee shall submit a report to the Illinois EPA's within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
- 12. Two copies of required reports and notifications concerning emissions equipment operation or performance testing shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276
Telephone: 217/782-5811 Facsimile: 217/524-4710

<u>and</u> one copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016
Telephone, 847/284-4000 Faccimile. 8

Telephone: 847/294-4000 Facsimile: 847/294-4018

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The new bodymaker and the modified Coating Lines 1 and 2 may continue to operate under this construction permit until the next reopening of the CAAPP permit.

If you have any questions on this, please call Ricardo Ng at 217/782-2113.

Donald E. Sutton, P.E. Manager, Permit Section Division of Air Pollution Control

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cc: Region 1

# Attachment A

Nonattainment NSR Applicability

# Contemporaneous Time Period of 1999 Through 2003

Emissions Increases Associated With The Proposed Modification

Item of Equipment	Proposed Operation Date	Actual Emissions (Tons/Year)	Proposed Emissions (Tons/Year)	Emissions Increase (Tons/Year)
New Bodymaker and Modification to Coating Lines 1 and 2	2003	129.4	152.5	23

Note: That this analysis is based on no increase in emissions other than the proposed modification in this Construction Permit for the contemporaneous time period of 1999 to 2003.

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